

ETEXT ATTACHMENT

03/18/2005 16 : 33

March 18, 2005

Ms. Aliesa V. Sagri
Senior Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20013

RE: The Society of Thoracic Surgeons Political Action Committee
(FEC ID#C00325936)
Amended Mid-Year Report (1/1/2003-6/30/2003)

Dear Ms. Sagri:

I am writing in response to your request for additional information letter dated February 16, 2005.

In April, 2004, the Society of Thoracic Surgeons (STS) completed a transition from the previous external management of its government relations activities, including its Political Action Committee, to the opening of an internally-managed Washington D.C. office. As part of this transition, the new management of The Society of Thoracic Surgeons Political Action Committee undertook a significant and complete review of all previous PAC transactions and reports.

We believe the reasons that the receipts described in your letter were not reported in a timely manner under the previous management were lack of adequate staff training in reporting requirements and recordkeeping, insufficient oversight of the reporting process, and lack of written procedures and poor internal controls. The receipts in question seem to have been inadvertently omitted from the mid-year report.

Please be assured that we take this and any other compliance shortcomings very seriously. As mentioned above, when these errors were discovered, the new in-house manager immediately undertook an investigation and proactively corrected and disclosed through amendment all transactions accurately and completely.

To ensure that such infractions never take place again, we have taken several significant steps to reform and improve our reporting and oversight processes. We have engaged a former FEC auditor, created detailed written procedures, established and continue to run dual transactional software systems, and retrained our staff.

And last, we have instituted as an internal control that all balance sheets, profit and loss statements and bank reconciliations are reviewed by the Society's accounting department at its headquarters office in Chicago.

We are confident that these changes in management, training, recordkeeping, duplicate systems, and both internal and external control will demonstrate our commitment to full compliance, and prevent any future errors.

Please feel free to contact the STS PAC Assistant Treasurer, Michael Hogan, at 1025 Connecticut Avenue, NW, Suite 1104, Washington, DC 20036; or by telephone at (202) 481-1026 should you have any questions or concerns about this matter.

Sincerely yours,

Keith S. Naunheim, MD
Treasurer